UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

JAMIL RIVERA, on behalf of himself and all others similarly situated,

Plaintiff,

CASE NO. 3:19-cv-01894-GAG

VS.

MARRIOTT INTERNATIONAL, INC. and INTERNATIONAL HOSPITALITY ENTERPRISES, INC.

Defendants.

MOTION FOR ADMISSION PRO HAC VICE OF SHANON J. CARSON

COMES NOW Shanon J. Carson applicant herein and respectfully states:

1. Applicant is an attorney with the law firm of Berger Montague PC, with offices at:

1818 Market Street, Suite 3600 Philadelphia, PA 19103 scarson@bm.net Tel: (215) 875-4656 Fax: (215) 875-4604

- 2. Applicant will sign all pleadings with the name Shanon J. Carson.
- 3. Applicant has been retained personally or as a member of the above-named firm by Jamil Rivera to provide legal representation in connection with the above-styled matter now pending before the United States District Court for the District of Puerto Rico.
- 4. Since 2000, applicant has been and presently is a member in good standing of the bar of the highest court of the Commonwealth of Pennsylvania where applicant regularly practices law. Applicant's bar license number is 85957.

5. Applicant has been admitted to practice before the following courts:

<u>Court</u>	Date Admitted
USDC, Eastern District of Arkansas	September 2009
USDC, District of Colorado	April 2014
USDC, Central District of Illinois	July 2015
USDC, Northern District of Illinois	February 2012
USDC, Eastern District of Michigan	July 2019
USDC, District of Nebraska	December 2008
USDC, Northern District ofNew York	September 2012
USDC, Western District of New York	April 2012
USDC, Eastern District of Pennsylvania	November 2000
USDC, Middle District of Pennsylvania	October 2013
USDC, Western District of Pennsylvania	December 2010
USDC, Eastern District of Texas	April 2016
USDC, Southern District of Texas	August 2014
USDC, Western District of Texas	October 2016

- 6. Applicant is a member in good standing of the bars of the courts listed in Paragraph 5.
- 7. Applicant is not currently suspended from the practice of law before any court or jurisdiction.
- 8. Applicant is not currently the subject of any complaint for unethical conduct, disciplinary proceeding or criminal charges before any court or jurisdiction.

9. Local counsel of record associated with Applicant in this matter is:

Jane A. Becker Whitaker
Jean Paul Vissepo Garriga
BECKER & VISSEPO, PSC
U.S.D.C. 205510
P. 0. Box 9023914
San Juan, Puerto Rico 00902-3914
Tel: (787) 945-2406
jbw@beckervissepo.com
jp@beckervissepo.com

- 10. Applicant has read the local rules of this court and will comply with the same.
- 11. Applicant has read the Local Civil Rules of the United States District Court for the District of Puerto Rico which provide in part that attorneys appearing *pro hac vice* must comply with the provisions set forth therein and pay an admission fee of \$300.00 per appearance in each new case before the Court. Accordingly, receipt of payment of the *pro hac vice* admission fee is attached hereto in the form of a check or money order payable to "Clerk, U.S. District Court."
- 12. WHEREFORE, Applicant respectfully requests to be admitted to practice in the United States District Court for the District of Puerto Rico for the above-styled cases only.

November 11, 2019

Respectfully submitted,

Shanon J. Carson

BERGER MONTAGUE PC

1818 Marke Street, Suite 3600

Philadelphia, PA 19103

Tel: (215) 875-4656 Fax: (215) 875-4604 scarson@bm.net I HEREBY CERTIFY, pursuant to Local Civil Rule 83A(f), that we consent to the designation of local counsel of record for all purposes.

November <u>13</u> , 2019

Respectfully submitted,

/s/JaneBeckerWhitaker

Jane A. Becker Whitaker
Jean Paul Vissepo Garriga
BECKER & VISSEPO, PSC
U.S.D.C. 205510
P. 0. Box 9023914
San Juan, Puerto Rico 00902-3914
Tel: (787) 945-2406

Tel: (787) 945-2406 jbw@beckervissepo.com jp@beckervissepo.com

I HEREBY CERTIFY that I have served a true and correct copy of this document upon each attorney of record and the original upon the Clerk of Court accompanied by a \$300.00 pro hac vice admission fee.

Shanon J. Carson

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Philadelphia, PA 19103 Tel: (215) 875-4656

Fax: (215) 875-4604 scarson@bm.net

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ORDER REGARDING MOTION FOR ADMISSION <u>PRO HAC VICE OF SHANON .J. CARSON</u>

The Court, having considered the above Application for Admission *Pro Hae Vice*, orders that:

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	the application be granted. The Clerk of the Court shall deposit the admission fee to
	the account of Non-Appropriated Funds of this Court.
	the application is denied. The Clerk of the Court shall return the admission fee to the
	applicant.
	SO ORDERED.
	In San Juan, Puerto Rico, this day of, 2019.
	Judge Gustavo A. Gelpi U.S. District Judge
	O.S. District Judge